

AMY E. POTTER, OSB No. 231794

amy@angelilaw.com

ANGELI LAW GROUP LLC

121 SW Morrison Street, Suite 400

Portland, OR 97204

Telephone: (503) 954-2232

Facsimile: (503) 227-0880

MICHAEL BERTHOLF, OSB No. 044642

michaelbertholaw@gmail.com

Law Offices of Michael P Bertholf LLC

108 Mistletoe St

Medford, OR 97501

Telephone: (541) 245-9167

Facsimile: (541) 773-6790

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff.

v.

NEGASI ZUBERI, aka SAKIMA ZUBERI,
aka JUSTIN JOSHUA HYCHE,

Defendant.

Case No. 1:23-cr-00254-MC

**DEFENDANT'S PROPOSED
VERDICT FORM**

The Defendant, through his attorneys, respectfully submits the attached proposed verdict form.

DATED: August 7, 2024.

Respectfully submitted,

ANGELI LAW GROUP LLC

s/ Amy E. Potter

Amy E. Potter

Attorney for Defendant

DEFENDANT'S PROPOSED VERDICT FORM

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff.

v.

NEGASI ZUBERI, aka SAKIMA ZUBERI,
aka JUSTIN JOSHUA HYCHE,

Defendant.

Case No. 1:23-cr-00254-MC

VERDICT

We, the jury, being duly empaneled and sworn, hereby unanimously find NEGASI ISHAIAH SUBERI, aka SAKIMA ZUBERI, aka JUSTIN JOSHUA HYCHE, as follows:

Count 1
Kidnapping

_____ Not Guilty

_____ Guilty

If you checked "Guilty", you must choose at least one of the following to explain which type(s) of conduct your verdict is based on:

(Please check all that apply)

_____ Defendant transported AV1 across state lines from Washington to Oregon

_____ Defendant traveled in interstate commerce in committing, or in furtherance of, the offense

_____ Defendant used any means, facility, or instrumentality of interstate commerce in committing or furtherance of the offense

Count 2
Transportation for Criminal Sexual Activity

_____ Not Guilty

_____ Guilty

VERDICT

Page 1 of 5

Count 3
Kidnapping

_____ Not Guilty

_____ Guilty

If you checked "Guilty", you must choose at least one of the following to explain which type(s) of conduct your verdict is based on:

(Please check all that apply)

_____ Defendant used a cell phone in furtherance of the kidnapping

_____ Defendant used a motor vehicle in furtherance of the kidnapping

_____ Defendant used an ATM in furtherance of the kidnapping

Count 4
Felon in Possession of a Firearm or Ammunition

_____ Not Guilty

_____ Guilty

If you checked "Guilty", you must choose at least one of the following to explain which ammunition or firearm your verdict is based on:

(Please check all that apply)

_____ an HS Produkt Springfield XDM 9x19mm pistol

_____ approximately 8 rounds of Blazer 9mm Luger ammunition

_____ approximately 4 rounds of Hornady 9mm Luger ammunition

_____ approximately 4 rounds of NovX 9mm Luger ammunition

_____ approximately 3 rounds of SIG 9mm Luger ammunition

Count 5
Felon in Possession of a Firearm or Ammunition

_____ Not Guilty

_____ Guilty

If you checked “Guilty”, you must choose at least one of the following to explain which ammunition or firearm(s) your verdict is based on:

(Please check all that apply)

- ☐ a Remington Arms Company, Model 783, .308 Winchester caliber rifle
- ☐ an Anderson Manufacturing, Model AM-15, multi-caliber rifle
- ☐ an E.R. Amantino (Stoeger), Model Condor Competition, 12 gauge shotgun
- ☐ approximately 27 rounds of Lake City Arsenal 5.56 ammunition
- ☐ approximately 27 rounds of Blazer 9mm Luger ammunition
- ☐ two rounds of Remington Arms 9mm Luger ammunition
- ☐ one round of Hornady 9mm Luger ammunition
- ☐ approximately 16 rounds of NovX 9mm Luger ammunition
- ☐ approximately 17 rounds of SIG 9mm Luger ammunition
- ☐ one Federal 12 gauge shotgun shell
- ☐ one Winchester 12 gauge shotgun shell

Count 6

Felon in Possession of a Firearm or Ammunition

☐ Not Guilty

☐ Guilty

If you checked “Guilty”, you must choose at least one of the following to explain which ammunition or firearm your verdict is based on:

- ☐ approximately 410 rounds of Lake City Arsenal 5.56 ammunition
- ☐ one round of Hornady 6mm ARC ammunition
- ☐ one round of Tula Cartridge Works 7.62x39 ammunition
- ☐ approximately 4 Federal 12 gauge shotgun shells
- ☐ approximately 14 Winchester 12 gauge shotgun shells

Count 7

Felon in Possession of a Firearm or Ammunition

_____ Not Guilty

_____ Guilty

If you checked “Guilty”, you must choose at least one of the following to explain which ammunition or firearm your verdict is based on:

_____ approximately 79 rounds of Tula Cartridge Works 7.62x39 ammunition

_____ approximately 246 rounds of Remington Arms 9mm Luger ammunition

_____ approximately 8 rounds of Blazer 9mm Luger ammunition

_____ approximately 30 rounds of Hornady 6mm ARC ammunition

Dated: October _____, 2024

PRESIDING JUROR